

Application No.: 10/699,311
Reply to Office Action mailed on 9/21/2007
Reply dated 12/17/2007

REMARKS

In response to the above-identified Office Action, Applicant amends the Application and seeks reconsideration in view of the following remarks. In this Response, Applicant amends claims 1-25, and 27, and cancels claim 29 without prejudice. Applicant does not add any new claims. Accordingly, claims 1-28 remain pending in the Application.

I. Claims Rejected Under 35 U.S.C. § 112

Claims 1-29 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Specifically, the Patent Office asserts that “N number of video channels” and “P number of video processing pipelines” are vague because their values are undetermined. Applicant has cancelled claim 29 and traverses the rejection of claims 1-28, at least in view of the amendments to claims 1-25 and 27.

Applicant has amended claims 1-25 and 27 by deleting the terms “N number of video channels” and “P number of video processing pipelines” and replacing these terms with “a plurality of video channels” and “a plurality of video processing pipelines,” respectively. Therefore, Applicant submits that claims 1-28, as amended, are not vague. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 1-28.

II. Claims Rejected Under 35 U.S.C. § 102

Claims 1, 7, and 11-13 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,118,498 issued to Reitmeier (“*Reitmeier*”). Applicant respectfully traverses the rejection, at least in view of the amendments to independent claims 1 and 7.

To anticipate a claim, the cited reference must disclose each and every element of the rejected claim (*see MPEP § 2131*). Among other elements, amended claim 1 defines an apparatus for display of video data from a plurality of video sources comprising “a plurality of video decoders configured to be coupled to different video sources.” Applicant submits that *Reitmeier* fails to disclose at least these elements of claim 1.

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Reitmeier discloses “a method and apparatus for masking program selection latency in an MPEG-like information stream receiver, such as an ATSC or DVB television receiver” (*Reitmeier*, Col. 2, lines 15-18). Specifically, *Reitmeier* discloses an apparatus including two demodulators (see *Reitmeier*, FIG. 1, reference numerals 15A and 15B) connected to a single RF source (see *Reitmeier*, FIG. 1, reference numeral 5; *see also Reitmeier*, Col. 3, lines 33-48). Applicant submits that because *Reitmeier*’s apparatus is only connected to one RF source, *Reitmeier* fails to disclose an apparatus including “a plurality of video decoders coupled to different video sources,” as recited in claim 1.

The failure of *Reitmeier* to disclose each and every element of claim 1 is fatal to the anticipation rejection. Accordingly, Applicant respectfully requests withdrawal of the rejection of independent claim 1.

Referring to the rejection of claim 7, claim 7 defines a method comprising “receiving video data from each of the plurality of video sources” and “decoding, with a plurality of video decoders, at least a portion of the video data received from the plurality of video sources,” similar to claim 1 discussed above. Therefore, Applicant submits that the discussion above regarding *Reitmeier* failing to disclose at least a plurality of video sources is equally applicable to claim 1. Therefore, *Reitmeier* fails to disclose each and every element of claim 7.

The failure of *Reitmeier* to disclose each and every element of claim 7 is fatal to the anticipation rejection. Accordingly, Applicant respectfully requests withdrawal of the rejection of independent claim 7.

Claims 11-13 depend from claim 7 and include all of the elements thereof. Therefore, Applicant submits that claims 11-13 are not anticipated by *Reitmeier* at least for the same reasons as claim 7, in addition to their own respective features. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 11-13.

III. Claims Rejected Under 35 U.S.C. § 103

A. *Reitmeier in view of Machida*

Claims 2-5 and 8 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of European Patent No. EP 1,158,788 issued to Machida et al. (“*Machida*”). Applicant respectfully traverses the rejection, at least in view of the amendments to independent claims 1 and 7, from which claims 2-5 and 8 depend, respectively.

To render a claim obvious, the cited references must teach or suggest each and every element of the rejected claim (*see MPEP § 2143*). In rejecting claims 2-5 and 8, the Patent Office characterizes *Reitmeier* similar to the rejection of claim 1 discussed above. Applicant has discussed the failure of *Reitmeier* to teach or suggest at least “a plurality of video decoders configured to be coupled to different video sources,” as recited in claim 1 and similarly recited in claim 7, and respectfully submits that such discussion is equally applicable to claims 2-5 and 8 because of their respective dependencies from claims 1 and 7. The Patent Office relies on the disclosure in *Machida* to cure the defects of *Reitmeier*; however, Applicant submits that *Machida* fails to cure such defects.

In making the rejection, alleges *Machida* discloses “an image size/location to receive a designated size of a display window and the designated number of the N number of video channels whose video data is to be displayed in the display window, the image size/location logic to determine a location in the display window and a size of a part of the display window for display for the video data for each of the designated number of video channels” (Paper No./Mail Date 20070914, pages 5-6). The Patent Office does not cite *Machida* as disclosing “a plurality of video decoders configured to be coupled to different video sources,” as recited in claims 2-5 (via claim 1) and similarly recited in claim 8 (via claim 7). Furthermore, in reviewing *Machida*, Applicant is unable to discern any sections of *Machida* disclosing such elements. Specifically, *Machida* discloses “an image generation apparatus and an image generation method that synthesizes a plurality of dynamic picture images or static images on one screen” (*Machida*, Col. 1, lines 12-15). That is, *Machida* discloses an apparatus including a video encoder and a video decoder (*see Machida*, FIG. 4, reference numerals 211 and 210, respectively) connected to a single camera (*see*

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Machida, FIG. 4, reference numeral 212). Because *Machida*'s apparatus is only connected to a single camera, *Machida* fails to cure the defects of *Reitmeier*.

The failure of the combination of *Reitmeier* and *Machida* to disclose each and every element of claims 2-5 and 8 is fatal to the obviousness rejection. Therefore, claims 2-5 and 8 are not obvious over *Reitmeier* in view of *Machida*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 2-5 and 8.

B. *Reitmeier* in view of *Miyazaki*

Claims 6 and 9-10 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of U.S. Patent No. 5,883,676 issued to Miyazaki et al. (“*Miyazaki*”). Applicant respectfully traverses the rejection, at least in view of the amendments to independent claims 1 and 7, from which claims 6 and 9-10 depend, respectively.

Claims 6 and 9-10 depend from claims 1 and 7, respectively, and include all of the elements thereof. In rejecting claims 6 and 9-10, the Patent Office characterizes *Reitmeier* similar to the rejection of claim 1 discussed above. Applicant has discussed the failure of *Reitmeier* to teach or suggest at least “a plurality of video decoders configured to be coupled to different video sources,” as recited in claim 1 and similarly recited in claim 7, and respectfully submits that such discussion is equally applicable to claims 6 and 9-10 because of their respective dependencies from claims 1 and 7. The Patent Office relies on the disclosure in *Miyazaki* to cure the defects of *Reitmeier*; however, Applicant submits that *Miyazaki* fails to cure such defects.

In making the rejection, the Patent Office cites *Miyazaki* as disclosing “a write multiplexer (multiplexer 12) receiving data, the write multiplexer storing data into a memory (VRAM, see Fig. 1),” “storing a processed decoded part of the data...into a part of a video buffer that is not updating the display,” and “switching the part of the video buffer that is not updating the display with a part of the video buffer” (Paper No./Mail Date 20070914, page 8). The Patent Office does not cite *Miyazaki* as disclosing “a plurality of video decoders configured to be coupled to different video sources,” as recited in claim 6 (via claim 1) and similarly recited in claims 9-10 (via claim 7).

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Furthermore, in reviewing *Miyazaki*, Applicant is unable to discern any sections of *Miyazaki* disclosing such elements. Therefore, *Miyazaki* fails to cure the defects of *Reitmeier*.

The failure of the combination of *Reitmeier* and *Miyazaki* to disclose each and every element of claims 6 and 9-10 is fatal to the obviousness rejection. Therefore, claims 6 and 9-10 are not obvious over *Reitmeier* in view of *Miyazaki*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 6 and 9-10.

C. *Reitmeier* in view of *Machida*, *Miyazaki*, and *Klosterman*

Claim 14 stands rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Machida*, and further in view of *Miyazaki* and U.S. Patent No. 6,453,471 issued to *Klosterman* (“*Klosterman*”). Applicant respectfully traverses the rejection, at least in view of the amendments to claim 14.

Among other elements, claim 14 defines a method for displaying video data from a plurality of video sources comprising “receiving the video data from the plurality of video sources at a first video decoder and a second video decoder, decoding, via the first video decoder, a first frame of the video data from a first video source, and decoding, via the second video decoder, a second frame of the video data from a second video source,” similar to claim 1 discussed above. When rejecting claim 14, the Patent Office characterizes *Reitmeier*, *Machida*, and *Miyazaki* similar to the various rejections discussed above. Applicant has discussed above the failure of *Reitmeier*, *Machida*, and *Miyazaki* to disclose elements that are similar to the elements recited in claim 14, and respectfully submits that the various discussions above are equally applicable to the rejection of claim 14. Therefore, the combination of *Reitmeier*, *Machida*, and *Miyazaki* fails to teach or suggest each and every element of claim 14. The Patent Office relies on the disclosure in *Klosterman* to cure the defects of *Reitmeier*, *Machida*, and *Miyazaki*; however, Applicant submits that *Klosterman* fails to cure such defects.

In making the rejection, the Patent Office alleges that *Klosterman* discloses “receiving an image size of an image in which a channel is to be display” (Paper No./Mail Date 20070914, page

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9). The Patent Office does not cite *Klosterman* as disclosing “receiving the video data from the plurality of video sources at a first video decoder and a second video decoder, decoding, via the first video decoder, a first frame of the video data from a first video source, and decoding, via the second video decoder, a second frame of the video data from a second video source,” as recited in claim 14. Moreover, in reviewing *Klosterman*, Applicant is unable to discern any sections of *Klosterman* disclosing such elements. Therefore, *Klosterman* fails to cure the defects of *Reitmeier*, *Machida*, and *Miyazaki*.

The failure of the combination of *Reitmeier*, *Machida*, *Miyazaki*, and *Klosterman* to disclose each and every element of claim 14 is fatal to the obviousness rejection. Therefore, claim 14 is not obvious over *Reitmeier* in view of *Machida*, and further in view of *Miyazaki* and *Klosterman*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 14.

D. *Reitmeier* in view of *Machida*, *Miyazaki*, *Klosterman*, and *Miura*

Claims 15-18 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Machida*, and further in view of *Miyazaki* and *Klosterman*, and further in view of U.S. Patent No. 6,456,335 issued to Miura et al. (“*Miura*”). Applicant respectfully traverses the rejection, at least in view of the amendments to claim 14, from which claim 15-18 depend.

Claims 15-18 depend from claim 14 and include all of the elements thereof. In rejecting claims 15-18, the Patent Office characterizes *Reitmeier*, *Machida*, *Miyazaki*, and *Klosterman* similar to the rejection of claim 14 discussed above. Applicant has discussed the failure of the combination of *Reitmeier*, *Machida*, *Miyazaki*, and *Klosterman* to teach or suggest at least “receiving the video data from the plurality of video sources at a first video decoder and a second video decoder, decoding, via the first video decoder, a first frame of the video data from a first video source, and decoding, via the second video decoder, a second frame of the video data from a second video source,” as recited in claims 15-18 (via claim 14) and respectfully submits that such discussion is equally applicable to claims 15-18 because of their respective dependencies from claim 14. The

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Patent Office relies on the disclosure in *Miura* to cure the defects of *Reitmeier*, *Machida*, *Miyazaki*, and *Klosterman*; however, Applicant submits that *Miura* fails to cure such defects.

In making the rejection, the Patent Office alleges that *Miura* discloses “determining whether a video channel is in a failed state” (Paper No./Mail Date 20070914, page 10). The Patent Office does not cite *Miura* as disclosing “receiving the video data from the plurality of video sources at a first video decoder and a second video decoder, decoding, via the first video decoder, a first frame of the video data from a first video source, and decoding, via the second video decoder, a second frame of the video data from a second video source,” as recited in claims 15-18 (via claim 14). Moreover, in reviewing *Miura*, Applicant is unable to discern any sections of *Miura* disclosing such elements. Therefore, *Miura* fails to cure the defects of *Reitmeier*, *Machida*, *Miyazaki*, and *Klosterman*.

The failure of the combination of *Reitmeier*, *Machida*, *Miyazaki*, *Klosterman*, and *Miura* to disclose each and every element of claims 15-18 is fatal to the obviousness rejection. Therefore, claims 15-18 are not obvious over *Reitmeier* in view of *Machida*, and further in view of *Miyazaki*, *Klosterman*, and *Miura*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 15-18.

E. *Reitmeier* in view of *Miura*

Claims 19 and 23-26 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Miura*. Applicant respectfully traverses the rejection, at least in view of the amendments to independent claim 19.

Among other elements, independent claim 19 defines a system comprising “a plurality of video sources, wherein each of the plurality of video sources is configured to transmit video data via one of a plurality of video channels, and a video logic coupled to the plurality of video channels, the video logic comprising a plurality of video decoders, wherein each of the plurality of video decoders is configured to receive the video data from one of the plurality of video sources and to decode the video data,” similar to claim 14 discussed above. When rejecting claim 19, the Patent Office characterizes *Reitmeier* and *Miura* similar to the various rejections discussed above. Applicant has

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discussed above the failure of *Reitmeier* and *Miura* to disclose elements that are similar to the elements recited in claim 19, and respectfully submits that the various discussions above are equally applicable to the rejection of claim 19. Therefore, the combination of *Reitmeier* and *Miura* fails to teach or suggest each and every element of independent claim 19.

Claims 23-26 depend from claim 19 and include all of the elements thereof. Therefore, Applicant submits that claims 23-26 are not obvious over *Reitmeier* and *Miura* at least for the same reasons as claim 19, in addition to their own respective features. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 23-26.

F. *Reitmeier* in view of *Miura* and *Machida*

Claims 20-22 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Miura* and *Machida*. Applicant respectfully traverses the rejection, at least in view of the amendments to independent claim 19, from which claims 20-22 depend.

Claims 20-22 depend from claim 19 and include all of the elements thereof. When rejecting claims 20-22, the Patent Office characterizes *Reitmeier* and *Miura* similar to the rejection of claim 19 discussed above. Applicant has discussed above the failure of *Reitmeier* and *Miura* to disclose “a plurality of video sources, wherein each of the plurality of video sources is configured to transmit video data via one of a plurality of video channels, and a video logic coupled to the plurality of video channels, the video logic comprising a plurality of video decoders, wherein each of the plurality of video decoders is configured to receive the video data from one of the plurality of video sources and to decode the video data,” as recited in claim 19 and respectfully submits that such discussion is equally applicable to the rejection of claims 20-22 because of their respective dependencies from claim 19. Therefore, *Reitmeier* and *Miura* fail to disclose each and every element of claims 20-22. The Patent Office relies on the disclosure in *Machida* to cure the defects of *Reitmeier* and *Miura*; however, Applicant submits that *Machida* fails to cure such defects.

In making the rejection, the Patent Office alleges *Machida* discloses “an image size/location to receive a designated size of a display window and the designated number of the N number of

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video channels whose video data is to be displayed in the display window, the image size/location logic to determine a location in the display window and a size of a part of the display window for display for the video data for each of the designated number of video channels” (Paper No./Mail Date 20070914, page 15). The Patent Office does not cite *Machida* as disclosing “a plurality of video sources, wherein each of the plurality of video sources is configured to transmit video data via one of a plurality of video channels, and a video logic coupled to the plurality of video channels, the video logic comprising a plurality of video decoders, wherein each of the plurality of video decoders is configured to receive the video data from one of the plurality of video sources and to decode the video data,” as recited in claims 20-22 (via claim 19). Moreover, in reviewing *Machida*, Applicant is unable to discern any sections of *Machida* disclosing such elements. Therefore, *Machida* fails to cure the defects of *Reitmeier* and *Miura*.

The failure of the combination of *Reitmeier*, *Miura*, and *Machida* to disclose each and every element of claims 20-22 is fatal to the obviousness rejection. Therefore, claims 20-22 are not obvious over *Reitmeier* in view of *Miura* and *Machida*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 20-22.

G. *Reitmeier* in view of *Miura* and *Miyazaki*

Claims 27-29 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Reitmeier* in view of *Miura* and *Miyazaki*. Applicant has cancelled claim 29 without prejudice and respectfully traverses the rejection of claims 27-28, at least in view of the amendments to independent claim 19, from which claims 27-28 depend.

Claims 27-28 depend from claim 19 and include all of the elements thereof. When rejecting claims 27-28, the Patent Office characterizes *Reitmeier* and *Miura* similar to the rejection of claim 19 discussed above. Applicant has discussed above the failure of *Reitmeier* and *Miura* to disclose “a plurality of video sources, wherein each of the plurality of video sources is configured to transmit video data via one of a plurality of video channels, and a video logic coupled to the plurality of video channels, the video logic comprising a plurality of video decoders, wherein each of the plurality of video decoders is configured to receive the video data from one of the plurality of video sources and to decode the video data,” as recited in claims 20-22 (via claim 19). Moreover, in reviewing *Machida*, Applicant is unable to discern any sections of *Machida* disclosing such elements. Therefore, *Machida* fails to cure the defects of *Reitmeier* and *Miura*.

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plurality of video decoders is configured to receive the video data from one of the plurality of video sources and to decode the video data,” as recited in claim 19 and respectfully submits that such discussion is equally applicable to the rejection of claims 27-28 because of their respective dependencies from claim 19. Therefore, *Reitmeier* and *Miura* fail to disclose each and every element of claims 27-28. The Patent Office relies on the disclosure in *Miyazaki* to cure the defects of *Reitmeier* and *Miura*; however, Applicant submits that *Miyazaki* fails to cure such defects.

In making the rejection, the Patent Office cites *Miyazaki* as disclosing “a write multiplexer (multiplexer 12) receiving data, the write multiplexer storing data into a memory (VRAM, see Fig. 1),” (Paper No./Mail Date 20070914, page 17). The Patent Office does not cite *Miyazaki* as disclosing “a plurality of video sources, wherein each of the plurality of video sources is configured to transmit video data via one of a plurality of video channels, and a video logic coupled to the plurality of video channels, the video logic comprising a plurality of video decoders, wherein each of the plurality of video decoders is configured to receive the video data from one of the plurality of video sources and to decode the video data,” as recited in claims 27-28 (via claim 19). Moreover, in reviewing *Miyazaki*, Applicant is unable to discern any sections of *Miyazaki* disclosing such elements. Therefore, *Miyazaki* fails to cure the defects of *Reitmeier* and *Miura*.

The failure of the combination of *Reitmeier*, *Miura*, and *Miyazaki* to disclose each and every element of claims 27-28 is fatal to the obviousness rejection. Therefore, claims 27-28 are not obvious over *Reitmeier* in view of *Miura* and *Miyazaki*. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 27-28.

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CONCLUSION

In view of the foregoing, it is believed that all claims now pending are in condition for allowance. A Notice of Allowance is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (480) 385-5060 or jgraff@ifllaw.com.

If necessary, the Commissioner is hereby authorized to charge payment or credit any overpayment to Deposit Account No. 50-2091 for any fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

Respectfully submitted,

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